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Attorneys for Defendant  
JAMES O'KEEFE III

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

JUAN CARLOS VERA,

Plaintiff,

v.

JAMES O'KEEFE III, an individual,  
HANNAH GILES, an individual,  
and DOES 1-20, inclusive,

Defendants.

Case No. CV 10-1422-L-MDD

**DEFENDANT JAMES O KEEFE III  
FED. R. CIV. P. RULE 26(a)(3)  
DISCLOSURES**

Pre-Trial Conference

Date: July 23, 2012

Time: 11:00 a.m.

Judge: Hon. M. James Lorenz

Pursuant to the Court's December 14, 2011 Amended Case Management Order Regulating Discovery and Other Pretrial Proceedings, Defendant James O'Keefe III ("O'Keefe") hereby submits his Federal Rules of Civil Procedure Rule 26(a)(3) Pre-trial Disclosures to the Honorable M. James Lorenz, in advance of the final Pretrial Conference on July 23, 2012 at 11:00 a.m.

**I. WITNESSES**

O'Keefe expects to call the following witnesses at trial:

Hannah Giles  
c/o Benjamin Powell  
WILMER CUTLER PICKERING HALE & DORR LLP  
1875 Pennsylvania Avenue, NW  
Washington, D.C. 20006

Alejandro Hernandez  
c/o National City Police Department  
1200 National City Boulevard  
National City, CA 91950

Dr. Miguel Vera Islas  
Laboratorio Clinico Alba  
P. Ensenada # 1430-A Secc. Jardines, Playas de Tijuana  
Tijuana, BC

James O'Keefe  
c/o Michael Madigan  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
1152 15th Street, NW  
Washington, D.C. 20005

David Lagstein  
4438 38<sup>th</sup> St.  
San Diego, CA 92116

Amy Schur  
1331 Westerly Terrace  
Los Angeles CA 90026

Juan Carlos Vera  
c/o Eugene Iredale, Esq.  
Law Offices of Eugene G. Iredale  
105 West "F" Street, 4<sup>th</sup> Floor  
San Diego, CA 92101

**II. WITNESSES BY DEPOSITION**

O'Keefe expects to present the testimony of the following individual(s) through deposition:

Hannah Giles (if she does not appear at trial)  
 c/o Benjamin Powell  
 WILMER CUTLER PICKERING HALE & DORR LLP  
 1875 Pennsylvania Avenue, NW  
 Washington, D.C. 20006

**III. EXHIBITS**

Case Title: Juan Carlos Vera v. James O'Keefe III , et al      Case No: CV 10-1422-L-MDD

**Defendant O'Keefe's List of Exhibits**

<b>Exhibit No.</b>	<b>Date Marked</b>	<b>Date Admitted</b>	<b>Description</b>
A			Defendant's unedited video recording of August 18, 2009 interaction with Vera at ACORN National City Office
B			Transcript (Parts I and II) of Defendant's unedited video recording of August 18, 2009 interaction with Vera at ACORN National City Office
C			Video of Defendant's interaction with Vera that was broadcast on Hannity Show (September 16, 2009)
D			Vera-ACORN September 18, 2009 Termination Memo
E			Plaintiff's Response to Defendant O'Keefe's Special Interrogatories (Set One) (Oct. 7, 2011).
F			Plaintiff's Response to Defendant Giles' Interrogatories (December 7, 2011) (Set One)
G			Plaintiff's Supplemental Response to Defendant Giles' Interrogatories (Set One) (Feb. 10, 2012).
H			Vera 2003 Federal Income Tax Return
I			Vera 2003 California State Income Tax Return
J			Vera 2005 Federal Income Tax Return
K			Vera 2005 California State Income Tax Return
L			Vera 2006 Federal Income Tax Return
M			Vera 2006 California State Income Tax Return
N			Vera 2007 Federal Income Tax Return
O			Vera 2007 California State Income Tax Return

1	P		Vera 2008 Federal Income Tax Return
2	Q		Vera 2008 California State Income Tax Return
3	R		Vera 2009 Federal Income Tax Return
4	S		Vera 2009 California State Income Tax Return
5	T		Vera 2010 Federal Income Tax Return
6	U		Vera 2011 California State Income Tax Return
7	V		Deposition transcript and video of Hannah Giles, and attached exhibits
8	W		Deposition video and transcript of David Lagstein, and attached exhibits
9	X		Deposition video and transcript of Juan Carlos Vera, and attached exhibits
10	Y		Schematic of inside the National City ACORN office in 2009
11	Z		ACORN statement terminating Juan Carlos Vera (Sept. 17, 2009)
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14  
15 DATE: July 2, 2012

MICHAEL J. MADIGAN  
ORRICK, HERRINGTON & SUTCLIFFE LLP

16  
17 /s/ Michael J. Madigan

Michael J. Madigan  
Attorney for Defendant